

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NICHOLAS MARTIN, on behalf of
himself and others similarly situated

Plaintiff,

v.

COMCAST CORPORATION,

Defendant.

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1:12-cv-6421

**AGREED MOTION FOR AN EXTENSION OF TIME TO ANSWER, MOVE, OR
OTHERWISE RESPOND TO THE COMPLAINT**

NOW COMES Defendant, Comcast Corporation (“Comcast”), by and through its attorneys, Drinker Biddle & Reath LLP, and hereby move this Court for an extension of time, from September 12, 2012 to and including October 12, 2012, to answer, move, or otherwise respond to the Complaint. In support of its Motion, Defendant states as follows:

1. Plaintiff, Nicholas Martin, filed his Complaint on August 14, 2012.

2. A copy of the Complaint was served on Defendant on or about August 24, 2012.

Accordingly, absent an extension, Defendant would have until September 14, 2012 to answer, move, or otherwise respond to the Complaint.

3. Defendants recently retained counsel in this matter. Counsel is requesting this extension of time so that they may properly investigate the facts, review and analyze the allegations contained in the Complaint, and prepare an appropriate response.

4. This is Defendant’s first request for an extension of time to answer, move, or otherwise respond.

5. Counsel for Defendant has spoken to counsel for Plaintiff. Plaintiff's counsel agreed to the extension requested herein and to the filing of this Motion and Plaintiff has no objection to the requested extension.

6. With the agreement of Plaintiff, Defendant therefore seeks an extension until October 12, 2012 to answer, move, or otherwise respond to the Complaint.

7. This Motion is made in good faith and not to hinder or delay these proceedings.

8. The granting of this Motion will not prejudice any party in this case.

WHEREFORE Defendant Comcast respectfully requests that this Court enter an Order granting Defendant's motion for an extension of time until October 12, 2012 to answer, move, or otherwise respond to the Complaint.

Dated: September 7, 2012

COMCAST CORPORATION

/s/ Chancé L. Cooper
Gordon Nash- ARDC # 2017199
Chancé L. Cooper- ARDC # 6292598
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CERTIFICATE OF SERVICE

I, Chancé L. Cooper, an attorney, certify that on September 7, 2012, I caused a true and correct copy of the **Agreed Motion for an Extension of Time to Answer, Move, or Otherwise Respond to the Complaint** to be served via electronic mail on all parties by operation of the Court's ECF filing system, including:

Alexander H. Burke
Burke Law Offices, LLC
155 N. Michigan Ave. Suite 9020
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3120729.5288

By: /s/ Chancé L. Cooper